IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division



UNITED STATES OF AMERICA) <u>UNDER SEAL</u>) Case No. 3:25-CR- 40
v.) 18 U.S.C. § 2252A(a)(5)(B)) Possession of Child Pornography
ALL AND ADDELL MADED AND) (Count 1)
ALLAN DARRELL MARTIN, JR.,) 18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1)
Defendant.) Receipt of Child Pornography) (Count 2)
) Forfeiture Notice

March 2025 Term – at Richmond, Virginia

INDICTMENT

THE GRAND JURY CHARGES THAT:

Introductory Allegations

At all times material to this Indictment, unless otherwise stated:

1. The defendant ALLAN DARRELL MARTIN, JR. resided in the Richmond metropolitan area and within the Eastern District of Virginia.

COUNT ONE (Possession of Child Pornography)

2. On or about July 17, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, ALLAN DARRELL MARTIN, JR., knowingly possessed material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), to wit, one or more digital files contained on a Black ASUS Laptop Computer, serial number: F1N0WU03581602B, which had been mailed, shipped and transported using any means and facility of interstate and foreign commerce, and was produced using materials that had

been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(5)(B).)

COUNT TWO (Receipt of Child Pornography)

3. On or about September 24, 2023, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, ALLAN DARRELL MARTIN, JR., knowingly received any child pornography, as defined in Title 18, United States Code, Section 2256(8), to wit, one or more digital files, that had been mailed, shipped and transported by any means and facility of interstate and foreign commerce, including by computer, and that had been shipped and transported using any means and facility of interstate and foreign commerce.

(In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).)

* * * * *

FORFEITURE NOTICE

Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendant is hereby notified that, if convicted of any of the offenses listed in Counts One or Two, the defendant shall forfeit to the United States his interest in any visual depiction produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Sections 2251 *et seq.*, and any property, real or personal, constituting or traceable to gross profits or other proceeds or used or intended to be used to commit or promote the commission of such offenses.

(In accordance with Title 18, United States Code, Section 2253.)

A TRUE BILL:

FOREPERSON

ERIK S. SIEBERT United States Attorney

By:

Heather Hart Mansfield

Heather Marsheld

Assistant United States Attorney

Pursuant to the E-Government Act, the original of this page has been filed under seal in the Clerk's Office

3/19/2029